

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

MOTION TO EXCEED PAGE LIMIT
ON LEGAL MEMORANDUM

The Plaintiff respectfully moves this Court for leave to file a legal Memorandum in opposition to the Defendant's Motion for Summary Judgment which exceeds the twenty (20) page limit specified in Local Rule 7.1(B)(4). As grounds for this motion, Plaintiff states:

1. The Defendants have filed a motion for summary judgment on the multiple claims raised in the Plaintiff's complaint which include hostile work environment claims based upon both race and gender, reasonable accommodations claims and retaliation claims.
2. As in many employment discrimination cases, the factual record in this case is voluminous, and the blending of relevant facts and applicable law is a lengthy endeavor.

3. The additional pages of legal argument in the Memorandum portion of the Plaintiff's Opposition is necessary in order to fully respond to the issues raised in the pending motion and adequately present both the factual and legal arguments supporting the Plaintiff's opposition to the pending summary judgment motion.

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: October 24, 2006

/s/ Hugh D. Heisler
Hugh D. Heisler
BBO # 563925
Heisler, Feldman, McCormick &
Garrow, P.C.
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CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that a true copy of the foregoing Motion was served electronically upon the attorney of record for the Defendants on October 24, 2006.

/s/ Hugh D. Heisler
Hugh D. Heisler